

MEMO ENDORSED



Hugh Baran
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April 17, 2024

Via ECF

Hon. Jessica G. L. Clarke
United States District Judge
United States District Court for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, New York, NY 10007

Re: *Zavala, et al. v. PEI Elec. Grp. Inc., et al.*, No. 20-cv-9437 (JGLC)(GWG)

Dear Judge Clarke:

Our firm, along with Make the Road New York, represents the Plaintiffs in the above-referenced matter. We write, under the Court's Individual Rule 2(e), to request a two-week extension of the deadline to file objections to the recent Report and Recommendation in this case.

On April 10, 2024, Magistrate Judge Gorenstein issued a Report and Recommendation on Plaintiffs' motion for a default judgment against Defendant Pablo Ibepaulino, ECF No. 138. Judge Gorenstein recommended that a default judgment be entered in favor of Plaintiffs, and that attorneys' fees, costs, and interest be awarded. ECF No. 157.

While Plaintiffs do not object to much of Judge Gorenstein's R&R, Plaintiffs do intend to file some objections. Pursuant to Fed. R. Civ. P. 72, Plaintiffs' objection to the R&R would be due on April 25, 2024. We write to request a two-week extension of time, until May 8, 2024, to submit our objections. The additional time is needed due to the pre-planned vacation of one attorney on the case, and the fact that two of the attorneys on the case will be observing the upcoming Passover holiday, which begins Monday.

We have not previously requested an extension of time to file this objection, and this extension will not affect any other pending deadlines in this matter, as there are none.

We thank the Court for its attention to this matter and consideration of this request.

Application GRANTED. Objections to the Report and Recommendation shall be filed by **May 8, 2024**. The Clerk of Court is directed to terminate ECF No. 158.

SO ORDERED.

Handwritten signature of Jessica Clarke in blue ink.

JESSICA G. L. CLARKE
United States District Judge

Dated: April 22, 2024
New York, New York

Respectfully submitted,

Handwritten signature of Hugh Baran in black ink.

Hugh Baran
Counsel for Plaintiffs

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